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August 17, 2006

VIA FEDERAL EXPRESS & E-MAIL

Mary L. Cottrell, Secretary of the Department
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, Second Floor
Boston, MA 02110

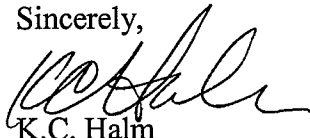
**Re: Petition of Charter Fiberlink MA-CCO, LLC for Arbitration of an
Interconnection Agreement; DTE 06-56**

Dear Secretary:

Enclosed for filing please find Charter Fiberlink MA-CCO, LLC's Responses to the First Set of Interrogatories and Document Requests of Verizon Massachusetts. Please note that the parties are currently discussing the terms of a non-disclosure agreement (or protective order if necessary) to cover confidential material sought in discovery. Once the terms of such agreement (or protective order) are finalized Charter Fiberlink will produce confidential material that is responsive to Verizon's requests.

If you have any questions about these materials please contact me at the telephone number listed above. Thank you.

Sincerely,



K.C. Halm

Counsel for

Charter Fiberlink MA-CCO, LLC

cc: Carol Pieper, Arbitrator
DTE 06-56 Service List

**BEFORE THE MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

In the Matter of

Petition of Charter Fiberlink MA-CCO, LLC
for Arbitration of an Amendment to the
Interconnection Agreement Between Verizon-
Massachusetts, Inc. and Charter Fiberlink MA-
CCO, LLC Pursuant to Section 252 of the
Communications Act of 1934, as Amended

D.T.E. Docket 06-56

**RESPONSE OF CHARTER FIBERLINK, MA-CCO, LLC TO
VERIZON MASSACHUSETTS' FIRST SET OF INTERROGATORIES
AND DOCUMENT REQUESTS**

Charter Fiberlink MA-CCO, LLC ("Charter") hereby provides responses to Verizon Massachusetts Inc. ("Verizon MA") First Set of Interrogatories and Document Requests to Charter.

RESERVATION OF RIGHTS

Charter reserves the right to supplement or modify its objections and responses, and to present further information and produce additional documents. Notwithstanding this reservation, Charter objects to the Requests to the extent they seek to impose on Charter an obligation to supplement these responses except to the extent required by applicable Massachusetts law.

GENERAL OBJECTIONS

1. Charter objects to these Requests to the extent they purport to impose any different or additional obligations from those imposed under applicable law.

2. Charter objects to these Requests to the extent they seek documents or information protected by the attorney client privilege, the attorney work product doctrine or any other applicable privileges or doctrines. Any inadvertent disclosure of such privileged documents or information shall not be deemed to be a waiver by Charter of the attorney-client privilege, work product doctrine, or other applicable privileges or doctrines. Charter further objects to any request to the extent it purports to impose overbroad or unduly burdensome reporting and documentation requirements regarding privileged information.

3. Charter objects to each Request to the extent that it is vague and ambiguous, particularly to the extent that it uses terms that are vaguely defined or not defined in the Request or the Definitions and Instructions.

4. Charter objects to these Requests to the extent they seek confidential or competitively sensitive business, financial, or other proprietary documents, trade secrets, or information or confidential information protected under interconnection agreements or 47 U.S.C. §222, belong to or in the possession of Charter. Charter further objects to the Requests to the extent they seek documents or information protected by the privacy protections of the Massachusetts or United States Constitution, or any other law, statute, or doctrine. Any confidential or proprietary documents produced by Charter are produced subject to the terms of the confidentiality agreements among the parties to this docket. The furnishing of Responses to these Requests is not intended nor should it be construed to waive Charter's right to protect from disclosure documents and information containing confidential or proprietary trade secrets or

business information. Charter reserves the right to redact, from the documents it produces or information it provides, any and all confidential or proprietary business information or trade secrets not relevant to the subject matter of this proceeding.

5. Charter objects to these Requests to the extent that they seek documents or information equally available through public sources or records because such requests subject Charter to unreasonable and undue annoyance, oppression, burden and expense.

6. Charter objects to these Requests to the extent that they seek to impose an obligation on Charter to respond on behalf of subsidiaries, affiliates, or other persons that are not subject to the jurisdiction of the Commonwealth of Massachusetts Department of Telecommunications and Energy (the "DTE") on the grounds that such discovery is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

7. Charter objects to the extent these Requests seek information that requires complex Responses. The function of interrogatories is to pose simple question relating to a particular subject matter that may be answered by a brief categorical statement.

8. Charter has interpreted these Requests to apply to Charter's regulated intrastate operations in Massachusetts and will limit its Response accordingly. To the extent any Requests are intended to apply to matters that take place outside of the State of Massachusetts and which are not related Massachusetts intrastate operations subject to the jurisdiction of the DTE, Charter objects to such Requests are irrelevant, overly broad, unduly burdensome, and oppressive.

9. Charter objects to these Requests to the extent they seek information not reasonably calculated to lead to the discovery of admissible evidence and not relevant or material to the subject matter of this Docket.

10. Charter objects to these Requests to the extent they are duplicative and

overlapping, cumulative of one another, overly broad, and/or seeks Responses in a manner that is unduly burdensome, expensive, oppressive, or excessively time consuming to Charter.

11. Charter objects to the Requests to the extent they seek to obtain "all," "each," or "every" document, item, customer, or other such piece of information because such discovery is overly broad and unduly burdensome.

12. Charter objects to these Requests as overly broad and unduly burdensome to the extent they seek to have Charter create documents not in existence at the time for the Request, or to produce documents not in Charter's possession, custody or control. Charter further objects to the extent they seek an analysis, calculation, or compilation which Charter has not performed previously and which Charter objects to performing.

13. Charter objects to these Requests as overly broad and unduly burdensome to the extent they are not limited to any stated period of time, or they pertain to a stated period of time that is longer than is relevant for purposes of the issues in this docket.

14. Charter objects to each and every Request that seeks information regarding Charter's projections regarding future services, revenues, marketing strategies, equipment deployments, or other such future business plans as such requests are trade secrets and, for purposes of this case, would be highly speculative and irrelevant to the issues to be decided.

15. Charter objects to the Requests to the extent that they seek to require information regarding the "responsible person." Such a request is unduly burdensome.

16. The objections, Response and documents produced in Response hereto, are not intended nor should be construed to waive Charter's right to object to these Requests, Responses or documents produced in Response hereto, or the subject matter of such Requests, Responses or

documents, as to their competency, relevancy, materiality, privilege and admissibility as evidence for any purpose, in or at the hearing of this or any other proceeding.

17. The Responses contained herein constitute the corporate Responses of Charter and contain information gathered from a variety of sources. The designation of a person responsible for providing a Response does not constitute an admission that the information requested fails within the scope of the person's testimony as a witness (if that person is a witness), or within the scope of this proceeding, or a waiver of any objection based on such grounds.

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1-VZ-INT-1. Please state the date on which Ted Schremp was first employed by Charter.

RESPONSE: Charter objects to this request on the grounds that the information sought is not relevant to the disputed issues in this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding its objections, Charter states that Ted Schremp was first employed by Charter on May 2, 2005.

RESPONDENT: Ted Schremp
Senior Vice President & General Manager
Charter Fiberlink
12405 Powerscourt Drive St.
Louis, MO 63131

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I-VZ-INT-2. Please describe Mr. Schremp's involvement in the negotiations between Verizon MA and Charter for a fiber meet amendment in Massachusetts.

RESPONSE: Charter objects to this request on the grounds that the information sought is not relevant to the disputed issues in this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Charter further objects on the basis that communications between Mr. Schremp and his counsel concerning contract negotiations and other disputed legal matters between Verizon MA and Charter are subject to the attorney-client privilege.

Notwithstanding its objections, Charter states that Mr. Schremp's involvement in negotiations was similar to the manner in which Mr. Schremp is involved in other contract negotiations between Charter Fiberlink and other entities. To that end Mr. Schremp assigned the task of negotiating this amendment to his legal counsel (both internal and external), representatives of the Corporate Engineering Department, and the Northeast Division Carrier Relations Manager. Further, Mr. Schremp delegated to his legal counsel, representatives of the Corporate Engineering Department, and Northeast Division Carrier Relations Manager the authority to conduct negotiations through the customary and routine procedures used in the telecommunications industry to negotiate such contracts. Direct party-to-party negotiations were held, on behalf of Charter, by its attorney Mr. Halm and the persons listed above. To the extent that this question calls for information regarding the nature and scope of Mr. Halm's consultation with Charter personnel, it is objectionable because it seeks information covered by the attorney-client privilege. Mr. Schremp received periodic updates and reports from his legal counsel and representatives from corporate engineering and carrier relations on the status of negotiations, outstanding legal and technical issues, and competing contract language. Mr. Schremp was also involved in internal meetings concerning the status of negotiations, the disputed issues therein, and the positions that Charter Fiberlink would take with respect to those issues.

RESPONDENT: Ted Schremp
Senior Vice President & General Manager
Charter Fiberlink
12405 Powerscourt Drive
St. Louis, MO 63131

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I-VZ-INT-3. Please describe Mr. Cornelius' involvement and participation in the negotiations between Verizon MA and Charter for a fiber meet amendment in Massachusetts.

RESPONSE: Charter objects to this request on the grounds that the information sought is not relevant to the disputed issues in this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Charter further objects on the basis that communications between Mr. Cornelius and Charter's legal counsel concerning contract negotiations and other disputed legal matters between Verizon MA and Charter are subject to the attorney-client privilege.

Notwithstanding its objections, Charter states that Mr. Cornelius was not directly involved in negotiations because a member of Charter Fiberlink's Corporate Engineering Department, Mr. Sam Routt, was tasked with day to day responsibility for assistance in negotiating the amendment proposed by Verizon MA. At about the time that this arbitration proceeding began, Mr. Routt left the company for employment with another company.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
Madison, Wisconsin 53717

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I-VZ-INT-4. Please identify the services Charter purchases from Verizon MA for interconnection. For each such service purchased, provide the following information:

- a. The quantities of each service purchased by Charter;
- b. The rate for each service purchased by Charter; and
- c. The traffic carried over each service.

RESPONSE: Charter objects to this request on the grounds that the request is vague and ambiguous in that it does not define the term "service" or the concept of purchasing services "for interconnection." Charter and Verizon interconnect pursuant to Verizon's obligation to do so under 47 U.S.C. § 251(c), and Charter is under no obligation to purchase services from Verizon to obtain such interconnection. For that reason Charter does not believe that it is reasonable to characterize the interconnection arrangements that Verizon enters into pursuant to its obligations as an ILEC under Sections 251-252 of the Act as "services."

Notwithstanding its objections, Charter states that it leases special access circuits from Verizon MA for the purpose of establishing direct network to network interconnection between the two parties' network to allow for the exchange of traffic between customers of Verizon MA and customers of Charter. It only does this because Verizon has, to date, been unwilling to provide interconnection to Charter under terms that are just, reasonable and nondiscriminatory.

- a. Charter leases five (5) DS3 special access circuits from Verizon MA.
- b. The total monthly recurring charge for these five circuits is \$31,355.76.
- c. The traffic carried over each DS3 special access circuit includes local, interexchange, transit and 911 traffic.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
Madison, Wisconsin 53717

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I-VZ-INT-5. Please identify all equipment owned by Verizon MA that could be used in a fiber meet arrangement with Charter.

RESPONSE: Charter objects to this request on the grounds that the request is vague and ambiguous. Moreover, Charter objects on the basis that the information is solely within Verizon's custody and control. It is impossible for Charter to know what equipment is owned by Verizon MA which "could" be used in a fiber meet arrangement with Charter.

Without waiving these objections, as a general matter, Charter believes that equipment owned by Verizon that could be used in a fiber meet arrangement with Charter would include: (a) Verizon's optical fiber plant; (b) Verizon's fiber optic terminals to which that plant is connected in Verizon tandem or other central offices; (c) SONET terminal that Verizon might choose to use to multiplex or demultiplex signals sent over a fiber meet point arrangement; and (d) associated fiber or metallic cross-connections linking the fiber optic terminals with multiplexing/demultiplexing equipment. Note that Charter owns essentially similar equipment that could be used in a fiber meet arrangement with Verizon, i.e., the two parties' equipment would be generally parallel in nature.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
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I-VZ-INT-6.

Please describe any technical and/or operational differences between a "SONET terminal" and an "Add/Drop multiplexer". Please provide a list of SONET terminals by manufacturer and model number that Charter would consider employing within its fiber meet facility. Also, please indicate when Charter first proposed to Verizon MA that the term "Add/Drop Multiplexer" be replaced with the term "SONET Terminal." Such description should include:

- a. The date such proposal was first made to Verizon MA by Charter;
- b. Whether the proposal was made verbally or in writing; and
- c. The names of the Verizon MA representatives to whom such proposal was first made.

RESPONSE:

Without waiving its objections stated below, with respect to that part of the question concerning technical and/or operational differences between a SONET terminal and an "Add/Drop multiplexer" Charter proposes using a Cisco 15454 SONET Multiservice Transport Platform for terminating an OC-12 connection from Verizon. Charter proposes to use the term "SONET" since, pursuant to section 3.2 of Exhibit A to the draft Fiber Meet amendment, the parties will interface at a SONET rate. The add/drop capabilities of each Parties' respective terminals address how each Party will disaggregate the SONET signal into smaller, or tributary, signals. Because the add/drop capabilities and the specifics of such, have no effect on the interface while the specific SONET rate does, SONET seems to be the more appropriate term.

With respect to that part of the question concerning when Charter first proposed that the term "Add/Drop Multiplexer" be replaced with the term "SONET Terminal" Charter objects to this request on the grounds that the information sought is not relevant to the disputed issues in this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONDENT:

Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
Madison, Wisconsin 53717

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I-VZ-INT-7. Please describe when Charter first proposed to Verizon MA that the parties' fiber meet amendment permit the use of multiple terminals on a ring configuration. Such description should include:

- a. The date such proposal was first made to Verizon MA by Charter;
- b. Whether the proposal was made verbally or in writing; and
- c. The names of the Verizon MA representatives to whom such proposal was first made.

RESPONSE: Charter objects to this request on the grounds that the information sought is not relevant to the disputed issues in this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
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I-VZ-INT-8. Please describe when Charter first proposed to Verizon MA changes to the notice provisions applicable to firmware upgrades. Such description should include:

- a. The date such proposal was first made to Verizon MA by Charter;
- b. Whether the proposal was made verbally or in writing; and
- c. The names of the Verizon MA representatives to whom such proposal was first made.

RESPONSE: Charter objects to this request on the grounds that the information sought is not relevant to the disputed issues in this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
Madison, Wisconsin 53717

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I-VZ-INT-9. Please describe when Charter first proposed to Verizon MA changes to the compensation provisions of the parties' fiber meet amendment where a move or change is required by a local or municipal government. Such description should include:

- a. The date such proposal was first made to Verizon MA by Charter;
- b. Whether the proposal was made verbally or in writing; and
- c. The names of the Verizon MA representatives to whom such proposal was first made.

RESPONSE: Charter objects to this request on the grounds that the information sought is not relevant to the disputed issues in this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
Madison, Wisconsin 53717

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I-VZ-INT-10. Please describe when Charter first proposed to Verizon MA that the parties should agree that within 30 calendar days of turn-up of the fiber meet point arrangement the parties will work together to establish an agreeable time frame for rolling over all existing DS3s that are in place between the parties. Such description should include:

- a. The date such proposal was first made to Verizon MA by Charter;
- b. Whether the proposal was made verbally or in writing; and
- c. The names of the Verizon MA representatives to whom such proposal was first made.

RESPONSE: Charter objects to this request on the grounds that the information sought is not relevant to the disputed issues in this proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
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1-VZ-INT-11. Please state the date when Charter first began exchanging traffic with Verizon MA in LATA 126.

RESPONSE: Without waiving its objections, Charter responds that the date when Charter first began exchanging traffic with Verizon MA in LATA 126 was March 10, 2006.

RESPONDENT: Paul Dunphy
Manager, Carrier Relations
12405 Powerscourt Drive
St. Louis, MO 63131

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I-VZ-INT-12. Please state the monthly traffic volumes Charter forecasted would be exchanged between Charter and Verizon MA in LATA 126 during the years 2004, 2005, 2006, 2007, and 2008.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information. Furthermore, the request seeks information that is not readily available to Charter because Charter does not forecast traffic volumes, but instead forecasts by trunking capacity (i.e. a specific number of trunks). Charter also objects on the basis that Verizon already possesses this information. Moreover, Charter does not have trunk forecasts for 2004 or 2005 for this LATA.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Paul Dunphy
Manager, Carrier Relations
12405 Powerscourt Drive
St. Louis, MO 63131

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I-VZ-INT-13. Please state the monthly traffic volumes Charter exchanged between Charter and Verizon MA in LATA 126 during the years 2004, 2005, and 2006.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information. Furthermore, the request seeks information that is not readily available to Charter in the form sought by Verizon.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place. In addition, Charter states that as explained in its response to Verizon Interrogatory No. 11, Charter only began to exchange traffic with Verizon on March 10, 2006. Therefore, there was no traffic exchanged between Charter and Verizon in 2004 and 2005.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
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Madison, Wisconsin 53717

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I-VZ-INT-14. Please state the date when Charter first began exchanging traffic with Verizon MA in LATA 128.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information.

Without waiving its objections Charter responds that the date when Charter first began exchanging traffic with Verizon MA in LATA 128 was October 7, 2004.

RESPONDENT: Paul Dunphy
Manager, Carrier Relations
12405 Powerscourt Drive
St. Louis, MO 63131

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I-VZ-INT-15. Please state the monthly traffic volumes Charter forecasted would be exchanged between Charter and Verizon MA in LATA 128 during the years 2004, 2005, 2006, 2007, and 2008.

RESPONSE: Charter objects to this request on the grounds that the information sought is confidential and proprietary. Furthermore, the request seeks information that is not readily available to Charter because Charter does not forecast traffic volumes, but instead forecasts by trunking capacity (i.e. a specific number of trunks). Moreover, Charter objects on the basis that Verizon already possesses this information.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
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I-VZ-INT-16. Please state the monthly traffic volumes Charter exchanged between Charter and Verizon MA in LATA 128 during the years 2004, 2005, and 2006.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information. Furthermore, the request seeks information that is not readily available to Charter in the form sought by Verizon.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
Madison, Wisconsin 53717

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I-VZ-INT-17. Please identify and describe Charter's network facilities at 354 Sheridan Street, Chicopee, Massachusetts.

RESPONSE: Charter objects to this request on the grounds that the information sought is confidential and proprietary.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
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I-VZ-INT-18. Please state whether Charter could locate a SONET Terminal or Add/Drop Multiplexer at 354 Sheridan Street, Chicopee, Massachusetts. If the response is other than an unqualified yes, please explain.

RESPONSE: Without waiving its objections Charter states that yes it could locate a SONET Terminal or Add/Drop Multiplexer at 354 Sheridan Street, Chicopee, Massachusetts.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
Madison, Wisconsin 53717

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I-VZ-INT-19. Please identify and describe Charter's network facilities at 199 Southbridge Street in Oxford, Massachusetts.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
Madison, Wisconsin 53717

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I-VZ-INT-20. Please state whether Charter could locate a SONET Terminal or Add/Drop Multiplexer at 199 Southbridge Street, Oxford., Massachusetts. If the response is other than an unqualified yes, please explain.

RESPONSE: Without waiving its objections Charter states that yes it could locate a SONET Terminal or Add/Drop Multiplexer at 199 Southbridge Street, Oxford, Massachusetts.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
8413 Excelsior Drive
Madison, Wisconsin 53717

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I-VZ-INT-21. Please identify each fiber meet arrangement Charter has with any other incumbent local exchange carrier. For each such arrangement, please provide the following information:

- a. The location of such arrangement;
- b. The date such arrangement was turned-up; and
- c. The monthly volume of traffic exchanged over such arrangement during the last 24 months.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential and proprietary. In addition, to the extent that the request seeks information outside of Massachusetts the request is overbroad and not likely to lead to the admission of relevant evidence. Further, the information requested in Verizon Interrogatory 21(c) is not readily available and would require a burdensome special study.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
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I-VZ-INT-22. Please state whether 911 calls from Verizon MA's customers could be exchanged over a fiber meet arrangement with Charter in Massachusetts. If the answer is other than an unqualified no, please explain.

RESPONSE: Verizon's question appears to be based on an apparent confusion between physical transport facilities (such as the fiber meet point that Charter wishes to establish) and the trunking arrangements used to transmit the traffic over the physical facilities. There is no technical reason that 911 traffic could not be sent from Charter to Verizon by means of the physical fiber facility (and associated fiber terminals) that would be established in a fiber meet arrangement. With that said, Charter recognizes that 911 traffic has special trunking requirements that would mandate that the traffic be sent on separate trunks established over the fiber facility. At the Verizon side of the meet point arrangement, Verizon would need to demultiplex those separate trunks from the overall traffic sent via the fiber optic facility and route the 911 traffic to the applicable Verizon selective router. In addition, because Verizon is the designated 911 provider in Massachusetts Verizon would not normally send 911 traffic to Charter, but would instead route such traffic to its own 911-specific tandems and selective routers.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
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I-VZ-INT-23. Please state whether operator services calls from Verizon MA's customers could be exchanged over a fiber meet arrangement with Charter in Massachusetts. If the answer is other than an unqualified no, please explain.

RESPONSE: There is no technical limitation to the fiber meet arrangement that would preclude operator services traffic from being sent over the fiber meet arrangement. Verizon's question appears to be based on confusion between physical transport facilities (such as the fiber meet point that Charter wishes to establish) and the trunking arrangements used to transmit the traffic over the physical facilities. There is no technical reason that operator services traffic could not be sent from Charter to Verizon by means of the physical fiber facility (and associated fiber terminals) that would be established in a fiber meet arrangement. With that said, Charter recognizes that operator services traffic has special trunking requirements that would mandate that the traffic be sent on separate trunks established over the fiber facility. At the Verizon side of the meet point arrangement, Verizon would need to demultiplex those separate trunks from the overall traffic sent via the fiber optic facility and route the operator services traffic appropriately. In addition, Verizon would not normally send operator services traffic to Charter over the fiber meet arrangement, unless Verizon makes a routing error, since Charter doesn't provide operator services to Verizon.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
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I-VZ-INT-24. Please state whether directory assistance calls from Verizon MA's customers could be exchanged over a fiber meet arrangement with Charter in Massachusetts. If the answer is other than an unqualified no, please explain.

RESPONSE: There is no technical limitation to the fiber meet arrangement that would preclude directory assistance traffic from being sent over the fiber meet arrangement. Verizon's question appears to be based on confusion between physical transport facilities (such as the fiber meet point that Charter wishes to establish) and the trunking arrangements used to transmit the traffic over the physical facilities. There is no technical reason that directory assistance traffic could not be sent from Charter to Verizon by means of the physical fiber facility (and associated fiber terminals) that would be established in a fiber meet arrangement. With that said, Charter recognizes that directory assistance traffic has special trunking requirements that would mandate that the traffic be sent on separate trunks established over the fiber facility. At the Verizon side of the meet point arrangement, Verizon would need to demultiplex those separate trunks from the overall traffic sent via the fiber optic facility and route the directory assistance traffic appropriately. In addition, Verizon would not normally send directory assistance traffic to Charter over the fiber meet arrangement, unless Verizon makes a routing error, since Charter doesn't provide directory assistance services to Verizon.

RESPONDENT: Mike Cornelius
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I-VZ-INT-25. Please state whether interexchange calls from Verizon MA's customers to purchasers of switched access services could be exchanged over a fiber meet arrangement with Charter in Massachusetts. If the answer is other than an unqualified no, please explain.

RESPONSE: Charter objects to this request on the grounds that the request is vague and ambiguous in that the term "purchasers of switched access services" is not defined and could include one of several different entities.

Without waiving these objections, Charter responds that yes, interexchange calls from Verizon MA's customers to purchasers of switched access services could be exchanged over a fiber meet arrangement with Charter in Massachusetts. IntraLATA traffic originating on Verizon's network is an example of a toll call that would be completed if sent over the fiber meet arrangement.

As explained in responses to previous Verizon interrogatories, there is no technical limitation to the fiber meet arrangement that would preclude the carriage of switched access calls.

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I-VZ-INT-26. Please identify and describe all telephony marketing plans for Massachusetts that Charter has developed, initiated, modified, cancelled, changed or implemented in the last five years.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information. In addition, to the extent that the request seeks information outside of Massachusetts the request is overbroad and not likely to lead to the admission of relevant evidence.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Ted Schremp
Senior Vice President & General Manager
Charter Fiberlink
12405 Powerscourt Drive
St. Louis, MO 63131

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1-VZ-INT-27.

Please identify and describe the specific equipment that Charter expects to use in the fiber meet arrangements with Verizon MA that are the subject of this proceeding. Please include in such description the specific component parts and equipment of any applicable fiber meet arrangement, including fiber optic terminals, OC3 cards, add/drop multiplexing equipment, fiber network interface devices, and fiber optic cables. For each component part and equipment:

- a. State with specificity the actual cost to Charter of the equipment identified in Charter's response to this data request, including an explanation of the basis for determining the cost of each component part and equipment;
- b. Identify the vendor(s) or equipment maker(s) from whom Charter purchases such component or equipment; and
- c. Identify and describe any discounts, price reductions, preferred payment arrangements or other arrangements that Charter expects to receive or obtain from the vendor(s) or equipment maker(s) from whom Charter purchases such component part or equipment;

RESPONSE:

Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information. Further, the information requested is not readily available and would require a burdensome special study.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT:

Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
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I-VZ-INT-28. Please identify and describe Charter's specific costs of engineering, labor, and construction of the fiber meet arrangements with Verizon MA that are the subject of this proceeding. Please separate and segregate Charter's costs for each component of work described in this data request (i.e., engineering costs, labor costs, and construction costs should all be identified separately).

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
Charter Fiberlink
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I-VZ-INT-29. Please identify and describe all geographic locations that Charter has deployed fiber optics, or fiber facilities, in LATAs 126 and 128.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
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I-VZ-INT-30. Please describe the method Charter uses to measure traffic over existing fiber meet arrangements or OC3 systems that it has deployed. Please include in this response the frequency that Charter measures such traffic (i.e., daily, weekly, monthly).

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
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1-VZ-DR-I. Any and all copies of documents, including but not limited to agreements, amendments, memoranda of understanding, and arrangements between Charter and any other local exchange carrier, IXC or other entity in Massachusetts governing fiber meet arrangements.

RESPONSE: None.

RESPONDENT: Paul Dunphy
Manager, Carrier Relations
Charter Fiberlink
12405 Powerscourt Drive
St. Louis, MO 63131

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I-VZ-DR-2. Any and all documents, including but not limited to maps, diagrams, schematics, and network plans, describing or identifying Charter's existing and planned fiber meet arrangements in Massachusetts.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information. In addition, the request is overbroad and not likely to lead to the admission of relevant evidence.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
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I-VZ-DR-3. Any and all documents, including but not limited to maps, diagrams, schematics, and network plans, describing or identifying the location of fiber that Charter has deployed, or will deploy within the next thirty six months.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information. In addition, the request is overbroad and not likely to lead to the admission of relevant evidence.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
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I-VZ-DR-4. Any and all documents that describe the network equipment and related facilities in Charter's current and planned fiber meet arrangements in Massachusetts.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information. In addition, the request is overbroad and not likely to lead to the admission of relevant evidence.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
Director, IP Telephony Engineering
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I-VZ-DR-5. Any and all documents concerning Charter's costs of purchasing and deploying equipment and fiber optic facilities, including but not limited to acquisition costs, engineering, labor and construction costs, of the Charter's existing and planned fiber meet arrangement Charter in Massachusetts.

RESPONSE: Charter objects to this request on the grounds that the request seeks information that is confidential, proprietary and highly competitively sensitive plans and information. In addition, the request is overbroad and not likely to lead to the admission of relevant evidence.

Without waiving its objections, Charter will produce information responsive to this request once a non-disclosure agreement or protective order is in place.

RESPONDENT: Mike Cornelius
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I-VZ-DR-6. Any and all documents that contain information responsive to the Data Requests contained herein.

RESPONSE: Please see Charter responses to Verizon document requests numbers 1 through 5.

RESPONDENT: [N/A]

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I-VZ-DR-7. Any and all documents used to respond to these Data Requests and Requests for the Production of Documents.

RESPONSE: Please see Charter responses to Verizon document requests numbers 1 through 6.

RESPONDENT: [N/A]